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November 13, 2023

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The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Yanping Wang*, 23 Cr. 118-3 (AT)

Dear Judge Torres:

I was recently retained to represent Ms. Wang in this matter. I write, with the consent of counsel for the government and the consent of counsel for co-defendant Ho Wan Kwok, to request the Court hold in abeyance the defendants' deadline for filing pre-trial motions, which is currently scheduled for November 15, 2023. The additional time is needed to enable me to obtain and review the discovery in this matter and to assess any potential pre-trial motions. We anticipate meeting and conferring with the government this week on discovery matters and on a proposed updated schedule.

Respectfully submitted,

/s/ Brendan F. Quigley
Brendan F. Quigley

SO ORDERED:

HON. ANALISA TORRES